

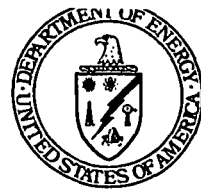


Department of Energy

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APR 18 2000



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Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V – 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0590-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Sirs:

PERMIT INFORMATION SUMMARY FOR THE DRUM SAMPLING LINE INSIDE BUILDING 30(A)

The purpose of this letter is to notify the United States Environmental Protection Agency (EPA) and the Ohio EPA of the drum sampling line located inside Building 30(A) at the Department of Energy, Fernald Environmental Management Project (DOE-FEMP) and to provide the Permit Information Summary associated with the drum sampling process. The sampling line will be utilized for sampling drums of uncharacterized materials to verify process knowledge and confirmatory sampling to meet Waste Acceptance Criteria for disposition. Drums to be sampled may contain hazardous and/or radioactive liquids and solids, but will not include a significant amount of asbestos-containing materials.

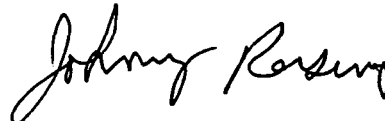
The potential for liquid spills, gaseous releases, and particulate releases does exist during the opening and sampling of the drums. Liquid spills will be contained within the sampling area by secondary containment, therefore, no liquids will leave the area or spill into the site sump system. Particulate emissions from the drum sampling line will be controlled by a portable High Efficiency Particulate Air (HEPA) filtration system that will exhaust directly to the environment through a ventilation hose. Based on 40 CFR 61 Subpart H, radionuclide emissions are low enough that a stack sampler is not required. However, radionuclide emissions are significant enough that HEPA filtration will be installed to ventilate the sampling process as part of meeting Best Available Technology (BAT) for controlling radionuclide emissions. Gaseous releases, mainly Volatile Organic Chemicals (VOCs), will also be ventilated from the sampling area by the HEPA filtration system. According to OAC 3745-15-05, VOC emissions will be low enough that control equipment is not required, therefore, no further action is necessary.

Comprehensive Environmental, Response, Compensation And Liabilities Act (CERCLA) Section 121(e)(1) states that no federal, state, or local permit shall be required for the portion of any removal or remedial action conducted entirely on site, where such remedial action is selected and carried out in compliance with Section 121. Drum sampling of uncharacterized materials inside Building 30(A) is being completed in support of the remedial action to clean up the FEMP and is being carried out in compliance with Section 121. Therefore, this project is not required to obtain any federal, state, or local permits. The project will be conducted in accordance with the terms and conditions of those permits that otherwise would have been required.

Section XIII.B of the Amended Consent Agreement requires the DOE to identify those permits that otherwise would be required along with the standards, requirements, criteria, or limitations that would have had to be met to obtain each permit. The DOE must report these findings to the U.S. EPA along with an explanation of how the response action will meet these standards, requirements, criteria, or limitations. The attachment provides the Permit Information Summary that identifies permits and associated requirements that are applicable to the drum sampling process inside Building 30(A).

Should you have any questions or require additional information, please contact Ed Skintik at (513) 648-3151.

Sincerely,



Johnny R. Reising
Fernald Remediation Action
Project Manager

FEMP:Skintik

Enclosure

cc

J. Sattler, OH/FEMP

J. Shine, OH/FEMP

D. Carr, Fluor Fernald/MS2

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T. Hagen, Fluor Fernald/MS65-2

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P. Spotts, Fluor Fernald/MS65-2

PERMIT INFORMATION SUMMARY

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PROJECT: DRUM SAMPLING LINE INSIDE BUILDING 30(A)

AIR PERMITS

Sampling drums inside Building 30(A) will result in the generation of particulate and gaseous emissions from the drum sampling line. The sampling line will be ventilated directly to the environment via a portable HEPA filtration system. The amount of particulate being released from the drum sampling line will not be significant, however, releases from the sampling line will contain radionuclides. The amount of radionuclides being released is significant enough that HEPA filtration shall be installed as part of the exhaust system. The amount of gaseous emissions, mainly VOCs, is not significant enough to warrant control equipment. Liquid spills will be contained by secondary containment within the sampling area, therefore, no liquid releases will enter the site sump system or the environment.

A- Identification of Air Permits that Would Otherwise be Required

State Permits

PERMIT TO INSTALL - OAC 3745-31-02 (A): Unless exempted by OAC 3745-31-03, no person shall cause, permit, or allow the installation of a new source of air pollutants or cause, permit, or allow the modification of an air contaminant source without first obtaining a Permit To Install. Under ordinary circumstances, an air Permit To Install would have to be obtained for the sampling line.

PERMITS TO OPERATE - OAC 3745-35-02 (A): Except as otherwise provided in Paragraph H (Conditional Permits To Operate) of rule OAC 3745-35-02 and in OAC rules 3745-35-03 (variances) and 3745-35-05 (Permit exemptions and registration status), no person may cause, permit, or allow the operation or other use of any air contaminant source without first applying for and obtaining a Permit To Operate. Under ordinary circumstances, a Permit To Operate would have to be obtained for the sampling line.

Federal Permits

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) - 40 CFR PART 61, SECTION 61.07(a): The owner or operator shall submit to the Administrator an application for approval of the construction of any new source or modification of any existing source. Unless exempted in a specific subpart, an application for approval would have to be submitted for sources subject to a NESHAP standard. The sampling line is subject to the requirements of Subparts H of 40 CFR 61.

40 CFR PART 61, SUBPART H - NATIONAL EMISSION STANDARDS FOR EMISSIONS OF RADIONUCLIDES OTHER THAN RADON FROM DOE FACILITIES: Section 61.96(b) states that an application for approval does not have to be filed for radionuclide sources if the effective dose equivalent caused by all emissions from the new construction or modification is less than 0.1 mrem per year. Emissions from the sampling line have been determined to be less than 0.1 mrem per year, therefore, an application for approval does not have to be filed.

- B- Identification of the Standards, Requirements, Criteria, or Limitations The following would have to be met to obtain the above Permits/ Notification:

State Requirements

PERMITS TO INSTALL - OAC 3745-31-05 (A): The sampling line must not prevent or interfere with the attainment or maintenance of applicable ambient air quality standards, must not result in a violation of any applicable laws, and must employ the best available technology (BAT) to control emissions.

PERMITS TO OPERATE - OAC 3745-35-02 (C): The sampling line must be operated in compliance with applicable air pollution control law; must be constructed, located, or installed in compliance with the Terms and Conditions of a Permit To Install; and must not violate National Emission Standards for Hazardous Air Pollutants adopted by the Administrator of the EPA.

Federal Requirements

NESHAP SUBPART H - 40 CFR PART 61, SECTION 61.92: Emissions of radionuclides (except radon222 and radon220) to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent of 10 mrem/yr.

- C- Explanation of How the Response Action Will Meet the Standards, Requirements, Criteria, or Limitations Identified Above

The drum sampling line located inside Building 30(A) will not interfere with the attainment or maintenance of any applicable air quality standards; nor will it result in a violation of any applicable laws. Emissions from the sampling line have been estimated and a stack sampler is not required, however, HEPA filtration shall be installed in compliance with meeting BAT requirements for controlling radionuclide emissions. The sampling line shall be exhausted via a portable HEPA filtration system directly to the environment.

The amount of gaseous emissions, mainly VOCs, that will be emitted from the sampling line is less than 10 pounds per day, therefore, according to OAC 3745-15-05, the installation of control equipment is not required and no further action is necessary.

A Hazardous Waste Facility Installation and Operation Permit is not required since containers of hazardous waste will be stored in Building 30(A) for less than ninety days. Containers of hazardous waste will be stored in this area in accordance with OAC 3745-52-34 requirements. Containers will be handled in a manner to prevent rupture, leakage, or spillage and will remain closed except during sampling activities.

WATER PERMITS

All liquid spills from the sampling line will be contained by secondary containment surrounding the sampling area. Due to the secondary containment, the sampling line will not generate any liquids that will enter the site sump system or the environment.

A- Identification of Wastewater Permits that Would Otherwise be Required

State Permits

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM - OAC 3745-33-02 (A): No person may discharge any pollutant or cause, permit, or allow a discharge of any pollutant without applying for and obtaining an Ohio NPDES permit. The FEMP currently operates under an approved Ohio NPDES permit.

Federal Permits

(The State of Ohio has primacy in administering the NPDES program.)

B- Identification of the Standards, Requirements, Criteria, or Limitations

The following would have to be met to obtain the above Permits/
Notification:

State Requirements

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM - OAC 3745-33-02 (A): All discharges authorized under the NPDES permit shall be consistent with the terms and conditions of the permit. Facility expansions, production increases, or modifications which result in new, different, or increased discharges of pollutants must be reported.

Federal Requirements

None.

- C- Explanation of How the Response Action Will Meet the Standards, Requirements, Criteria, or Limitations Identified Above

State Requirements

The operation of the Building 30(A) sampling line will not generate any liquids that will enter the site sump system or the environment. All liquid spills will be contained by secondary containment that surrounds the sampling area. Therefore, the sampling line will not interfere with the attainment or maintenance of any water quality standards; nor will it result in a violation of any applicable laws or current NPDES effluent limitations.

Federal Requirements

None.

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